UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

Robert Holt, et al. v. National Football League, et al. (Plaintiffs Gerald Robinson and Melissa Robinson ONLY)

Court File No. 2:12-cv-04185-AB

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFFS GERALD ROBINSON AND MELISSA ROBINSON

- J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiff's Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Gerald Robinson and Melissa Robinson only in this action, and state as follows:
- 1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 12-CV-04185, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Gerald Robinson and Melissa Robinson.
- 2. Plaintiffs' counsel filed a short form complaint for Gerald Robinson and Melissa Robinson on August 20, 2012.

- 3. Despite the efforts of the undersigned on Plaintiffs behalf, Plaintiffs have informed the undersigned that they no longer want Zimmerman Reed LLP to represent them in this litigation.
- 4. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully asks this Court for leave to withdraw as counsel for Gerald Robinson and Melissa Robinson only in Court File No. 2:12-cv-04185-AB.

Dated: May 12, 2020 Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

J. Gordon Rudd, Jr. (#222082)
Brian C. Gudmundson (#336695)
Michael J. Laird (#0398436)
1100 IDS Center, 80 South 8th Street
Minneapolis, MN 55402
Telephone: (612) 341-0400

Facsimile: (612) 341-0844 Gordon.Rudd@zimmreed.com Brian.Gudmundson@zimmreed.com Michael.Laird@zimmreed.com